

1 Frank S. Hedin (SBN 291289)
E-mail: fhedin@hedinhall.com
2 David W. Hall (SBN 274921)
E-mail: dhall@hedinhall.com
3 HEDIN HALL LLP
Four Embarcadero Center, Suite 1400
4 San Francisco, CA 94104
Telephone: (415) 766-3534

5 *Counsel for Plaintiff and the Putative Classes*

6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 AMANDA HILL, and GAYLE HYDE;
individually and on behalf of all others
9 similarly situated,

10 Plaintiffs,

11 v.

12 QUICKEN LOANS INC.,

Defendant.

Case No. 5:19-cv-00163-FMO-SP

**DECLARATION OF BRANDON
PICKETT IN SUPPORT OF
PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT
QUICKEN LOAN INC.'S MOTION
TO COMPEL ARBITRATION**

13 I, Brandon Pickett, declare under penalty of perjury, pursuant to 28 U.S.C. §
14 1746, based on my own personal knowledge, that the following statements are true:

15 1. I am over 18 years of age and am a resident of Buckeye, Arizona, and I
16 submit this declaration in support of plaintiff Amanda Hill's response in opposition to
17 Quicken Loans Inc.'s motion to compel arbitration of her claims.

18 2. In or about November 2014, I visited a webpage located at the website
19 LowerMyBills.com, which I understand is presently owned and/or operated by LMB
20 Mortgage Services, Inc. ("LMB"), a subsidiary of Rock Holdings Inc., the parent
21 company of Quicken Loans, Inc. During that visit, I may have selected information
22 from several initial drop down menus related to "Loan Type," "Property Use," "Home
23 Description," or "Your ZIP Code," and may have inputted certain information in fields

1 related to my then-existing mortgage, such as "Purchase Year," "Estimated Home
2 Value," and "Interest Rate." Although I may have partially filled in some of the non-
3 personal intake information on the webpage, I did not complete all of the intake fields,
4 and in particular I am certain that I did not input any of my or my wife's personal
5 contact information, did not click any "Click to See Your Free Results" button or other
6 buttons on any such website, and did not ever receive notice of or agree to any
7 purported terms of service available related to any such website.

8 3. I understand that, beginning in around November 2018, including on
9 November 7, 2018, LMB and other companies began sending SMS text messages to
10 my wife Amber Pickett's cellular telephone number, (602) 820-4581, without her
11 consent. This included at least one text message sent by LMB to my wife's 4581
12 number in November 2018 that was addressed to "Brandon" and which advertised
13 subprime mortgage relief services targeted towards veterans; I understand that LMB
14 used the telephone number 60107 to send this message addressed to "Brandon" to my
15 wife's cellular telephone number.

16 4. Again, at no point have I ever inputted my wife's telephone number, my
17 telephone number, or any of my or my wife's personal contact information to the
18 LowerMyBills.com website or any other website associated with LMB or any related
19 companies. And I certainly never pressed any button to submit the information that I
20 did input into any form on any LowerMyBills.com webpage.

21 I declare under penalty of perjury that the foregoing is true and correct.
22 Executed this ____ day of May, 2019 at ____.

23 By: 
24 Brandon Pickett